

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK (WHITE PLAINS)**

AVROHOM MANES,
Plaintiff,

CASE NO. 7:21-cv-04666
ECF Case

vs.

**TRANS UNION LLC'S
NOTICE OF REMOVAL**

SANTANDER CONSUMER USA, INC.,
d/b/a CHRYSLER CAPITAL; EXPERIAN
INFORMATION SOLUTIONS, INC.; and
TRANS UNION LLC;
Defendants.

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union LLC (“Trans Union”) hereby removes the subject action from the Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York on the following grounds:

1. Plaintiff Avroham Manes served Trans Union on or about May 5, 2021, with a Summons and Complaint filed in the Supreme Court of the State of New York, County of New York. Copies of the Summons and Complaint (the “Complaint”) are attached hereto, redacted pursuant to Federal Rule of Civil Procedure 5.2, as **Exhibit A** and **Exhibit B** respectively.

2. Plaintiff makes claims under, alleges that Defendant violated and alleges that Defendant are liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 1 and 56-63.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York.

5. Counsel for Trans Union has confirmed with the Supreme Court of the State of New York, County of New York that they have no document or file suggesting any other Defendant has been served. To the best of Trans Union's knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice Of Removal.

6. Notice of this removal will promptly be filed with the Supreme Court of the State of New York, County of New York, and served upon all adverse parties.

WHEREFORE, Defendant Trans Union LLC, by counsel, removes the subject action from the Supreme Court of the State of New York, County of New York to this United States District Court, Southern District of New York.

Respectfully submitted,

Date: May 25, 2021

s/ Camille R. Nicodemus
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Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **25th day of May, 2021**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, and/or email, on the **25th day of May, 2021** properly addressed as follows:

<u>for Plaintiff Avrohom Manes</u> Albert A. Levy, Esq. 17 Perlman Drive, Suite 215 Spring Valley, NY 10977 aalesq@gmail.com	
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s/ Camille R. Nicodemus

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Counsel for Defendant Trans Union, LLC